

May 22, 2007

Federal Communications Commission  
Washington, DC

These comments are in response to the RNPRM of 25 April, 2007 regarding wideband/broadband use in the 700 MHz band.

It is imperative that the Regional Planning Committees retain the decision making ability for approval of wideband or broadband use within the allotted 700 MHz frequency in each region. The regions through the RPC's know best the local needs and are able to adapt appropriately. The local regions should not be constrained by time, costs, coverage, or service limitations that a nationwide system would impose. Local control of wideband/broadband would allow agencies to tailor their data networks to match their voice networks.

One only has to consider how fast technology changes. Consider the state of wideband/broadband today verses just five (5) years ago. The ability of local public safety agencies to adapt quickly to changes (both major and minor) in public safety technology is usually constrained by local finances and financing options. Once a particular technology is selected, local public safety entities will usually be committed to that technology for an extended period of time.

There are a variety of ways to meet the goals of interoperability other than mandating a single technology. For example, a public safety agency may not have an operational need for broadband, or it may be constrained by costs. In either case, the local agency would know best based on what best serves the public in that region.

The first level of need for any public safety agency is operability, and that is based on local needs. Only after one has operability does the issue of interoperability rise. Interoperability is served first by voice, followed by data.

Today, most large urban areas currently have reasonable broadband coverage available from the cellular providers in that region. However, as one moves away from the higher population centers, the availability of that data service drops dramatically. Further, there is not a guarantee of availability or minimum level of service for public safety entities riding on public wireless networks. This requires that agencies in the less population dense areas look for other technology to meet their data needs.

It is further suggested that if a nation-wide broadband network is desired for interoperability, a minimum of 2.25 MHz of the PS broadband be left to the RPC's to build a local BB/WB network to serve local requirements, or to include those into a nationwide BB network.

Respectfully,

Doug Frankhouser, Chair Region 51